

# Exhibit C

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Master File No. 15-2599  
MDL No. 15-2599

IN RE: TAKATA AIRBAG PRODUCTS )  
LIABILITY LITIGATION )

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THIS DOCUMENT RELATES TO ALL )  
ACTIONS )

**ORDER OF APPOINTMENT OF SPECIAL MASTER**

Over a hundred plaintiffs have filed suit in federal courts against Takata, as well as other defendant businesses alleging that these companies are responsible for harm caused by defective airbags. Numerous other claims are expected to be filed in the future. In the interests of efficiency and consistency, the Judicial Panel on Multidistrict Litigation issued an order transferring these cases to the United States District Court for the Southern District of Florida for coordinated or consolidated pretrial proceedings. Because of the number and complexity of these cases and because of the need for an expeditious resolution of the disputes, the Court pursuant to Fed. R. Civ. P. 53(a)(1)(C) appoints a Special Master, whose duties and terms of appointment are detailed below.

**DUTIES**

1. Coordinating disclosure and discovery schedules with the lawyers.
2. Attempting to resolve informally any discovery disputes, including issues such as privilege, confidentiality, and access to records. If unable to resolve them, the Special Master shall issue a Report and Recommendation to the District Court on any pending discovery dispute. Objections to the Special Master's Report and Recommendation must be filed within 5 days of the filing of the Report with a response due by opposing counsel within 5 days of the filing of the Objections. The Court will apply the standard of review indicated in Rule 53 in deciding whether to adopt the Special Master's Report and Recommendation.
3. Resolve privilege or similar questions.

4. Help coordinate state litigation related to these Multidistrict cases.
5. Monitor scheduling of depositions.
6. The Special Master will not participate in settlement discussions other than those related to discovery and scheduling issues. A separate mediator shall be appointed to conduct settlement discussions.

#### APPOINTMENT

The Court appoints John Delionado, a partner in the law firm of Hunton and Williams in Miami. Mr. Delionado has indicated no conflicts in undertaking this task. Counsel may file an objection to the appointment if there are specific conflicts that would preclude the appointment of this Special Master. Such objections must be filed within 10 days of this order.

The Court has considered the fairness of imposing the likely expenses on the parties and will take the necessary steps to protect against unreasonable expenses or delay.

The Special Master shall be compensated at the rate of \$550 per hour, the expense of which shall be shared equally by the parties and paid on a monthly basis. The Special Master shall provide summary fee statements to Plaintiffs' Lead Counsel and the Defense team.

The Clerk is directed to add the Special Master to the Court's electronic service list.

DONE and ORDERED in chambers in Miami, Florida this 24<sup>th</sup> day of March, 2015.

  
FEDERICO A. MORENO  
UNITED STATES DISTRICT JUDGE

Copies Provided:

Counsel of Record

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